

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HANGZHOU QIANMAI ELECTRONIC
COMMERCE CO., LTD. d/b/a YNM,

Plaintiff/Counterclaim-Defendant,

v.

BEARABY INC. and SOMNOS, LLC
d/b/a BEARABY, LLC,

Defendants/Counterclaim-Plaintiffs.

Civil Action No.: 24-958-CFC

JURY TRIAL DEMANDED

**PLAINTIFF HANGZHOU QIANMAI ELECTRONIC COMMERCE CO.,
LTD.’S MOTION TO DISMISS DEFENDANTS BEARBY INC. AND
SOMOS, LLC’S COUNTERCLAIMS**

Plaintiff/Counterclaim-Defendant Hangzhou Qianmai Electronic Commerce Co., Ltd. b/d/a YNM (“Plaintiff”) hereby respectfully moves the Court to dismiss Defendants Bearaby, Inc. and Somnos, LLC d/b/a Bearaby, LLC’s (collectively, “Defendants”) counterclaims (D.I. 21) pursuant to Fed. R. Civ. P. 12(6) and D. Del. L.R. 7.1.2, on the grounds that the counterclaim patents are invalid for lack of patentable subject matter under 35 U.S.C. § 101. The bases for Plaintiff’s motion are set forth in the accompanying memorandum.

Date: November 7, 2024

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